

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**Varsity Brands, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' UNOPPOSED MOTION TO EXTEND THE TIME TO TAKE 30(b)(6)  
DEPOSITION TESTIMONY FROM DEFENDANTS CHARLESBANK CAPITAL  
PARTNERS LLC AND BAIN CAPITAL PRIVATE EQUITY**

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Plaintiffs Jessica Jones and Christina Lorenzen (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, move this Court for an order extending the time to take 30(b)(6) depositions of Defendants Charlesbank Capital Partners and Bain Private Equity through July 8, 2022.

Plaintiffs hereby submit this unopposed motion and state as follows:

1. On June 1, 2022, the Court issued an order granting in part and denying in part Plaintiffs' motion to compel 30(b)(6) depositions of Defendants Charlesbank and Bain. ECF No. 325. The Court held that "The parties shall complete the Rule 30(b)(6) depositions within thirty days of the entry of this order." *Id.*
2. On June 8, 2022, Plaintiffs issued new 30(b)(6) deposition notices, noticing the depositions for June 28 and June 29, 2022.

3. On June 9, Plaintiffs asked Defendants if they would be willing to schedule the depositions in early July, to accommodate Plaintiffs' counsel's previously scheduled international travel plans in June.
4. On June 10, 2022, Defendants responded that scheduling the depositions in early July would be acceptable, and proposed scheduling the depositions on July 6 and 7. Plaintiffs agreed to scheduling the depositions for July 6 and 7. *See Declaration of J. Saveri, Exhibit A.*
5. No other court deadlines would be effected by this extension.
6. Defendants do not oppose this motion.
7. In light of Plaintiffs' and Defendants' agreement to schedule the 30(b)(6) depositions on July 6 and 7, Plaintiffs respectfully request that the Court extends the time to take the 30(b)(6) depositions of Charlesbank and Bain through July 8, 2022.

Dated: June 13, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF CONSULTATION**

Per Local Rule 7.2, this is to certify that counsel for Plaintiffs, Charlesbank, and Bain have consulted regarding the issues presented in this motion. On June 10, 2022, David Seidel for Plaintiffs exchanged emails with Steven Kaiser for the Defendants. Plaintiffs affirm that, after consultation between the parties, both parties agree to extending the time to take the 30(b)(6) depositions.

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

Dated: June 13, 2022

By: /s/ Joseph R. Saveri  
Joseph R. Saveri